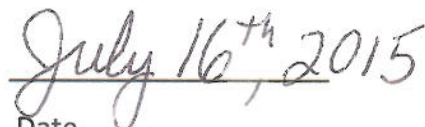


Affidavit of Molly Magoon

1. My name is Molly Magoon.
2. I am employed by the U.S. Environmental Protection Agency ("EPA"), Region 1, where I work as an Environmental Protection Specialist/Enforcement Officer (inspector) in the Toxics and Pesticides Unit.
3. My responsibilities include conducting inspections to determine compliance with the federal Renovation, Repair and Painting Rule ("RRP").
4. On May 11, 2015, I received, via email, a complaint about possible lead dust contamination resulting from sandblasting at the Mill West property located at 195 McGregor Street, Manchester, NH. The property is managed by Brady Sullivan Properties, LLC.
5. On May 12, 2015, I went to inspect the Mill West property along with two other EPA representatives. There I learned that the Mill West property has both commercial units and 98 residential units which are covered by EPA's lead laws.
6. While at the property, I also learned that Brady Sullivan hired Environmental Compliance Specialists, Inc. ("ECSI") to sandblast paint from a vacant portion of the building on the first floor. Mr. Jesse Wright, CEO of ECSI, informed me that the sandblasting work on the first floor started on approximately May 5, 2015.
6. While at the property, I met with employees of the New Hampshire Department of Health and Human Services and the City of Manchester Health Department.
7. On May 12, 2015, I walked through the Mill West property accompanied by Marc Pinard, Brady Sullivan's general counsel, and Scott Payrits, an employee of Brady Sullivan. I observed dust throughout the interior common areas of the building along with some chipping paint on the walls and doors in the common areas. I also observed that tenants had access to the common hallways. I also noticed several children in the common hallways while I was in the building.
8. Shortly after my inspection, I received the results of dust wipe sampling and X-Ray Fluorescent analysis performed at the Mill West property on May 12 and 14, 2015. The sampling results showed levels of lead well above the residential lead dust clearance standards established by EPA.

Signed under the pains and penalties of perjury.

  
Molly Magoon

  
Date